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**From:** Nam, Ed [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=A2653F1DDD59470688BA557DD84D9690-NAM, ED]  
**Sent:** 6/21/2019 2:29:51 PM  
**To:** Eileen Furey (furey.eileen@epa.gov) [furey.eileen@epa.gov]  
**Subject:** FW: Revised NSPS OOOOa Technical Reconsideration Options Selection

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**From:** Harris, Michael  
**Sent:** Friday, June 21, 2019 9:00 AM  
**To:** Dickens, Brian <dickens.brian@epa.gov>; Topinka, Natalie <topinka.natalie@epa.gov>; Nam, Ed <nam.ed@epa.gov>  
**Subject:** FW: Revised NSPS OOOOa Technical Reconsideration Options Selection

Hi Brian, Natalie, and Ed,  
If the call is still on today, the following is Region 5 response:

## Ex. 5 Deliberative Process (DP)

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**From:** Newton, Cheryl  
**Sent:** Friday, June 21, 2019 8:28 AM  
**To:** Thiede, Kurt <thiede.kurt@epa.gov>  
**Cc:** Harris, Michael <harris.michael@epa.gov>  
**Subject:** RE: Revised NSPS OOOOa Technical Reconsideration Options Selection

Great! So, thinking ahead. Mike – is someone planning on covering the call today should it proceed as scheduled? I don't have the appointment. I am also happy to send in the note (to whom?) but it may still make sense to have someone participate to hear how others approached this, read our statement and capture anything we'd want to be aware of as we develop our formal input. Since I don't have the appointment, someone will have to monitor and let us now if it happens to change in case Peter doesn't also write back.

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**From:** Thiede, Kurt  
**Sent:** Friday, June 21, 2019 8:20 AM  
**To:** Newton, Cheryl <Newton.Cheryl@epa.gov>  
**Cc:** Harris, Michael <harris.michael@epa.gov>  
**Subject:** Re: Revised NSPS OOOOa Technical Reconsideration Options Selection

I think that is perfect Cheryl.

Kurt Thiede  
Chief of Staff  
EPA Region 5

Sent from my iPhone...please excuse my typos.

On Jun 21, 2019, at 8:14 AM, Newton, Cheryl <[Newton.Cheryl@epa.gov](mailto:Newton.Cheryl@epa.gov)> wrote:

Good morning – A quick update. Peter wrote back and said he will check into options for a slight timing adjustment, but also noted it may be difficult due to his scheduled vacation. If there is no schedule change, perhaps we can either send in or share the following during the call. Thoughts? Note the opening for a date we think it might be doable to send in R5 comments? Thanks

## Ex. 5 Deliberative Process (DP)

**From:** Dickens, Brian

**Sent:** Thursday, June 20, 2019 4:00 PM

**To:** Newton, Cheryl <[Newton.Cheryl@epa.gov](mailto:Newton.Cheryl@epa.gov)>; Harris, Michael <[harris.michael@epa.gov](mailto:harris.michael@epa.gov)>

**Cc:** Nam, Ed <[nam.ed@epa.gov](mailto:nam.ed@epa.gov)>; Furey, Eileen <[furey.eileen@epa.gov](mailto:furey.eileen@epa.gov)>; Topinka, Natalie <[topinka.natalie@epa.gov](mailto:topinka.natalie@epa.gov)>; Breneman, Sara <[breneman.sara@epa.gov](mailto:breneman.sara@epa.gov)>; Mooney, John <[Mooney.John@epa.gov](mailto:Mooney.John@epa.gov)>; Thiede, Kurt <[thiede.kurt@epa.gov](mailto:thiede.kurt@epa.gov)>

**Subject:** RE: Revised NSPS OOOOa Technical Reconsideration Options Selection

From Natalie:

## Ex. 5 Deliberative Process (DP)

**From:** Newton, Cheryl

**Sent:** Thursday, June 20, 2019 3:43 PM

**To:** Harris, Michael <[harris.michael@epa.gov](mailto:harris.michael@epa.gov)>

**Cc:** Nam, Ed <[nam.ed@epa.gov](mailto:nam.ed@epa.gov)>; Furey, Eileen <[furey.eileen@epa.gov](mailto:furey.eileen@epa.gov)>; Topinka, Natalie <[topinka.natalie@epa.gov](mailto:topinka.natalie@epa.gov)>; Dickens, Brian <[dickens.brian@epa.gov](mailto:dickens.brian@epa.gov)>; Breneman, Sara <[breneman.sara@epa.gov](mailto:breneman.sara@epa.gov)>; Mooney, John <[Mooney.John@epa.gov](mailto:Mooney.John@epa.gov)>; Thiede, Kurt <[thiede.kurt@epa.gov](mailto:thiede.kurt@epa.gov)>

**Subject:** RE: Revised NSPS OOOOa Technical Reconsideration Options Selection

Thanks Mike – I will read closer on the train. What are our options for tomorrow given the timing of all this. Also, do we know how other workgroup members/regions view these issues and/or what they are planning to indicate tomorrow? Thanks

**From:** Harris, Michael  
**Sent:** Thursday, June 20, 2019 3:31 PM  
**To:** Newton, Cheryl <Newton.Cheryl@epa.gov>  
**Cc:** Nam, Ed <nam.ed@epa.gov>; Furey, Eileen <furey.eileen@epa.gov>; Topinka, Natalie <topinka.natalie@epa.gov>; Dickens, Brian <dickens.brian@epa.gov>; Breneman, Sara <breneman.sara@epa.gov>; Mooney, John <Mooney.John@epa.gov>  
**Subject:** RE: Revised NSPS OOOOa Technical Reconsideration Options Selection

Hi Cheryl,

I wanted to let you know that ECAD and ARD has concerns with some of the options recommended by OAQPS for inclusion in the final technical amendments to the 2016 New Source Performance Standard for Crude Oil and Natural Gas Facilities, Subpart OOOOa. The Options Selection is scheduled for Friday, June 21 at 11:00 Central. ECAD staff have participated on the national workgroup on this rule.

**Background:** On October 15, 2018, EPA proposed technical amendments to the 2016 NSPS OOOOa, with the comment period closing on December 17, 2018. The Agency is proposing its general positions on a variety of different rule components. Below are ECAD's comments on the major issues.

**Storage vessels:** The proposed option is to exempt storage vessels from NSPS OOOOa requirements if the source has a "legally and practically enforceable" state permit that requires 95% control of VOC emissions. These storage vessels would only be subject to fugitive emissions monitoring.

Region 5 ECAD and ARD has concerns with this approach for the following reasons:

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**Fugitive Emissions Monitoring:** The proposal includes different frequency of fugitive emissions monitoring for different types of well sites: "low-production" well sites (defined on a 12-month average production of <15 barrels of oil equivalent (BOE) per day), and all others. For wells that start out with production above 15 BOE per day, but drop below at some point, there may be considered an "off-ramp" for these sites.

Region 5 ECAD and ARD has concerns with this approach for the following reasons:

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**Alternative Means of Emissions Limitation (AMEL):** The proposal includes state-specific fugitives emissions monitoring programs that are determined to be equivalent to the fugitive emissions monitoring requirements in NSPS OOOOa. If deemed equivalent by this rule, a source could comply with the state standard in lieu of NSPS OOOOa fugitives monitoring standards.

Region 5 ECAD and ARD has concerns with this approach for the following reasons:

## Ex. 5 Deliberative Process (DP)

Michael D. Harris  
Acting Director  
Enforcement and Compliance Assurance Division  
U. S. Environmental Protection Agency, Region 5  
77 West Jackson Blvd.  
Chicago, IL 60604  
(312) 886-0760